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11 *Attorneys for Defendant, Hartford Fire Insurance Company*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 SALVADOR PLASCENCIA, individually; and
15 KYLE HAIL, individually,

16 Plaintiffs,

17 vs.

18 HARTFORD FIRE INSURANCE COMPANY,
19 a Connecticut Corporation; DOES, I through X,
20 inclusive; ROE BUSINESS ENTITIES, I
21 through X, inclusive,

22 Defendants.

Case No.: 2:22-cv-01420-GMN-VCF

**STIPULATION TO EXTEND TIME TO
RESPOND TO PLAINTIFFS'
COMPLAINT**

(Second Request)

23 Defendant Hartford Fire Insurance Company ("Hartford"), and Plaintiffs, Salvador
24 Plascencia and Kyle Hail ("Plaintiffs"), by and through their undersigned counsel of record,
25 hereby submit the following Stipulation to Extend Time to Respond to Plaintiff's Complaint
26 (Second Request) as follows:

27 On July 22, 2022, Plaintiffs Salvador Plascencia and Kyle Hail ("Plaintiffs") filed their
28 Complaint with the Eighth Judicial District Court for the State of Nevada as Case No. A-22-
855833-C [ECF No. 1-1]. Hartford removed the action to the United States District Court on
August 31, 2022 [ECF No. 1]. Hartford's original deadline to file its response to the Complaintive
pleading was 7 days from the removal pursuant to FRCP 81(c)(2)(C), which was September 7,
2022.

1 Previously, Hartford's counsel conferred with Plaintiffs' counsel regarding an extension of
 2 the deadline and filed an Unopposed Motion to Extend Time to Respond to Plaintiffs' Complaint
 3 to September 22, 2022 [ECF No. 4]. An Order granting the Motion was entered on September 20,
 4 2022 [ECF No. 7].

5 While Hartford has endeavored to file its response prior to the September 22, 2022
 6 deadline, Hartford's counsel has fallen ill and requested an additional one-week extension from
 7 Plaintiffs' counsel to respond to the Complaint. Plaintiffs do not object to the requested extension.

8 IT IS HEREBY STIPULATED that Hartford shall be allowed an additional week to file
 9 its responsive pleading with the new deadline being September 29, 2022. This is the second request
 10 for an extension which is made in good faith and not for purposes of delay.

11 IT IS SO STIPULATED.

12 DATED this 20th day of September, 2022.

DATED this 20th day of September, 2022.

13 WRIGHT, FINLAY & ZAK, LLP

PRINCE LAW GROUP

14 /s/ Lindsay D. Dragon

/s/ Kevin T. Strong

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21
 22
 23 IT IS SO ORDERED:

24 

25 UNITED STATES MAGISTRATE JUDGE

9-21-2022

26 DATED: _____